

Before the
Federal Communications Commission
Washington D.C., 20554

In the Matter Of)	
)	
Amendment of Part 15 regarding New)	ET Docket No. 04-37
Requirements and Measurement Guidelines)	
for Access Broadband over Power Lines)	

Comments of Motorola, Inc.

By Public Notice, the FCC has solicited comments on the request submitted by the United Telecom Council (UTC) to be recognized as the Broadband Over Power Line (BPL) database manager.¹ Motorola supports this request of UTC as it has demonstrated that it has the expertise to perform the necessary duties.

As the telecommunications and information technology trade association for electric and gas utilities, water companies, energy pipelines, and other critical infrastructure companies, UTC has been actively engaged with utilities and equipment vendors since the initial development of BPL technology. UTC's leadership in this area includes the creation of the United Power Line Council (UPLC), an independent operating unit of UTC focused on furthering development and deployment of reliable BPL systems.

¹ *OET Seeks Comment On Proposal By United Telecom Council To Serve As Database Manager For Access Broadband Over Power Line Systems*, DA 05-1637, Public Notice, (released June 9, 2005).

In its May 17, 2005 letter seeking recognition as the database manager, UTC notes that it already manages the database for coordination of power line carrier operations with Federal government operations in the frequency range 9-490 kHz.² Given UTC's relationship with both utilities and equipment manufacturers, and its experience as a database manager, it is well positioned to assume the tasks as the BPL database manager. For decades, UTC has served as an FCC-certified frequency coordinating committee for private land mobile systems operating under Part 90 of the Commission's rules so its database management capabilities and technical expertise are already well-established before the FCC.

Accordingly, Motorola fully supports the Commission recognizing UTC as the BPL database manger.

Respectfully submitted,

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² Letter from Bill Moroney, President and CEO, UTC to Ed Thomas, Chief, Office of Engineering and Technology, WT Docket No. 04-37, (submitted May 17, 2005).